

Remarks:

Applicants thank Examiner Perez-Daple for his careful examination of this application and clear explanation of the objections and rejections. In response, applicants amend claims 1, 2, and 18 to remove the informalities without changing the scope of the claims. As for the rejections, applicants respectfully submit that the rejections against claims 1, 2, 18, and 19 are improper for the following reasons:

1. The 102(a) rejection against claim 1 over the AAPA is improper because the Art does not disclose all the elements and limitations in claim 1.

Claim 1 describes computerized system for customizing an operational program for a slave object on a slave machine. The system comprises the following components and limitations:

- a. a master segmentator that
 - i. groups action-sites of a master object on a master machine into segments; and
 - ii. stores reference data related to said segments in a master file;
- b. a slave regenerator that is
 - i. coupled to the master file; and
 - ii. operable to regenerate the reference data so that variable characteristics of the slave machine are defined and adaptively compensated: and
- c. a slave corrector that is
 - i. coupled to said slave regenerator,
 - ii. operable to correct the operational program for the slave object on the adaptively compensated slave machine.

The AAPA does not disclose at least the following components and limitation:

- a. a segmentator that
 - i. groups action-sites; and

- ii. stores data related to the action-sites;
- b. a slave regenerator that is operable
 - i. to define variable characteristics of a slave machine; and
 - ii. to adaptively compensate for the variable characteristics of the slave machine; and
- c. a slave corrector that is operable to correct the operational program for a slave object on the slave machine.

Because the AAPA does not disclose at least the above listed components and limitations of claim 1, it does not anticipate claim 1.

2. The 102(a) rejection against claim 1 over the Seki reference is improper because the Seki reference does not disclose all the components and limitations of claim 1.

The Seki reference does not disclose at least the following components and limitations of claim 1:

- a. a segmentator that groups action-sites; and
- b. a slave regenerator that regenerates the reference data so that variable characteristics of the *slave machine* (not the master machine) are defined and compensated; and
- c. a slave corrector that corrects the operational program on the compensated *slave machine* (not the modified master object).

Because the Seki reference does not disclose at least the above listed components and limitations, it does not anticipate claim 1.

3. The 102(a) rejection against claim 1 over the Kono reference is improper because the Kono reference does not disclose all the components and limitations of claim 1.

The Kono reference does not disclose at least the following components and limitations of claim 1:

- a. a master segmentator that groups action-sites of a master object;

- b. a slave regenerator that regenerates the reference data so that variable characteristics of the *slave machine* (not “the deviations of the detected position of each of the wire bond objects”¹) are defined and compensated; and
- c. a slave corrector that corrects the operational program on the compensated *slave machine* (not “the deviations of the detected position of each of the wire bond objects”²).

Because the Kono reference does not disclose at least the above listed components and limitations, it does not anticipate claim 1.

- 4. The 102(a) rejection against claim 18 over the AAPA is improper because the Art does not disclose all the elements and limitations in claim 18.

Claim 18 describes a computer-implemented method for customizing an operational program for a slave object on a slave machine. The method comprises the following steps and limitations:

- a. grouping the action sites of a master object on a master machine into segments; and
- b. storing reference data related to the segments in a master file;
- c. regenerating the reference data so that variable characteristics of the slave machine are defined and adaptively compensated; and
- d. correcting the operational program for the slave object on the adaptively compensated slave machine.

Claim 18 has elements of limitation similar to those in claim 1 such as grouping action sites into segments, defining and compensating variable characteristics of the slave machine, and correcting the program on the compensated slave machine. As explained in Sections 1 – 4 above, the AAPA, the Seki reference, and the Kono reference all fail to disclose at least one of these elements. Therefore none of the references anticipates claim 18.

¹ U.S. 5,516,023 col. 3, ll. 10-11.

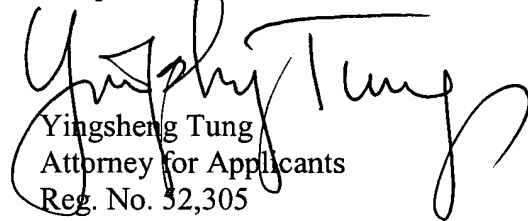
² Id.

5. Regarding the double patenting rejections, applicants respectfully submit that the rejection is improper because the Office action fails to establish prima facie obviousness.

The Office action failed to identify all elements in the claims that are not disclosed in the '963 patent, such as "grouping" the action cites into "segments", for example, and explain why they are obvious to a skilled artisan at the time of the invention.

In conclusion, applicants respectfully submit that as amended, this application is in allowable form; claims 1, 2, 18, and 19 distinguish over the cited references and are patentable. Applicants respectfully request that the application be further examined and the claims pass to allowance.

Respectfully submitted,


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